



September 6, 2019

Re: Dovetail Energy, LLC
Notice of Violation (NOV) NOV
NPDES
Greene County
1IN00305*AD

Ms. Betsy L. VanWormer, P.E.
Environmental Specialist III
Ohio EPA Division of Surface Water

Subject: Response to NOV

Ms. VanWormer,
Please see Renergy's responses below to resolve the NOV sent to us on August 13, 2019 for Dovetail Energy, LLC.

Violation Description: The 2018 annual sludge report indicates that the actual agronomic rate exceeded the calculated agronomic rate for 6 out of the 7 fields where biosolids were beneficially used in 2018.

Requested Action: Please provide an explanation for why the agronomic rate exceedances occurred and submit a plan detailing the procedures used to ensure that the calculated agronomic rate for beneficial use sites is not exceeded.

Renergy's Response:

It is impossible for us to predict the exact % total solids in our liquid fertilizer as it is being applied to farm fields as a result of environmental conditions such as precipitation, temperature and humidity levels, to name a few. We sample the fertilizer as it is being applied and ship to a 3rd party lab for testing, and it typically takes a week to get results. The % total solids testing came back much higher than expected for these fields, and the actual agronomic rates were exceeded as a result. Going forward, we will collect samples from the storage facilities being used and test the % total solids of our liquid fertilizer in our lab prior to land application, 1X per week at each facility during periods of land application and adjust the application rates accordingly to ensure that the actual agronomic rates are not exceeded.

Thank you,

Ashleigh Lemon
Communications and Sustainability Specialist
Renergy, Inc.